

Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

COLLEGE REPUBLICANS OF THE  
UNIVERSITY OF WASHINGTON; and  
CHEVY SWANSON, an Individual,

Plaintiffs,

v.

ANA MARI CAUCE, in her official capacity as president of the University of Washington; GERALD J. BALDASTY, in his official capacity as provost and executive vice president; RENE SINGLETON, individually and in her official capacity as assistant director, Student Activities; CHRISTINA COOP, individually and in her official capacity as senior activities advisor, Student Activities; JOHN N. VINSON, individually and in his official capacity as Chief of the University of Washington, Seattle, Police Department; CRAIG WILSON individually and in his official capacity as University of Washington, Seattle, Police Department Patrol Commander; and DOES 1-25;

Defendants.

No. 2:18-CV-00189 MJP

DECLARATION OF CHRISTINA  
COOP

I, CHRISTINA COOP, state as follows:

1. I am over the age of eighteen and competent to testify herein.

2. I am currently employed as a Student Activities Adviser in the University of  
2 Washington Division of Student Life (Student Life). During my more than 20 years in this  
3 position, I have gained extensive experience advising student organizations and government  
4 programs and services, including major events, orientation programs, ethnic and minority  
5 commissions, small business operations, radio station operations, and student body judiciary,  
6 elections and lobbying. In this role, I currently advise more than 50 student organizations. I  
7 hold a B.S. in Communications/Journalism from California State Polytechnic University-  
8 Pomona, and an M.Ed. in Student Development Administration from Seattle University.  
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10. As an advisor with the Division of Student Life (Student Life), I provide support  
11 and guidance to student leadership of registered student organizations (RSOs). There are  
12 currently more than 800 RSOs. I work with student leadership of RSOs to help them hold safe  
13 and successful events and ensure they are aware of University policies and procedures. I act as a  
14 liaison between RSOs and other University departments that may be involved in planning for a  
15 particular event, including the University of Washington Police Department (UWPD). As a  
16 result of this work, I am very familiar with University policies and procedures related to use of  
17 campus facilities.  
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19. During the event planning process, I discuss a range of topics with the students  
20 depending on the nature of the event, including any necessary security for the event, budget, and  
21 potential funding sources. Security for events can be provided by private security guards  
22 through an outside company and/or UWPD. When UWPD may be involved, I review with the  
23 students the Safety and Security Protocols for Events Sponsored by Student Organizations (Sept.  
24 2017). The Protocols are available online at <http://depts.washington.edu/thehub/sao/rso-policy->  
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guide/safety-and-security-protocols-for-events/. The University charges for a range of expenses incurred in connection with campus events hosted by RSOs, including room and equipment rental fees, outdoor power and electricity, and custodial services.

5. The University recognizes student organizations through a registration process. As part of that process, students agree to comply with the RSO Policy Guide. The Guide is designed to help student organization leaders and members become familiar with University policies and procedures. The Guide provides information about benefits available to RSOs, including office space, free use of campus facilities for regular meetings, and access to funding for events. The Guide also provides information about event planning, including the procedures and protocol for RSO to sponsor guest speakers on campus. (Guide, p. 31) The Guide provides information about when an event would need to be approved by the University Use of Facilities (UUF) committee (Guide, p. 51-52), as well as restrictions on distribution of handbills and leaflets and certain types of events, including events for commercial or private purposes (Guide, p. 18, 32). The RSO Policy Guide is available online at <http://depts.washington.edu/thehub/sao/rso-policy-guide/>. Other regulations and policies related to use of campus facilities also are available online.

6. Since October 2017, I have served as the Advisor to the College Republicans of the University of Washington (College Republicans). Before then, Rene Singleton, Assistant Director of Student Activities, together with Phil Hunt, a Student Activities Advisor until he retired in September 2017, served as the College Republicans' advisors. Ms. Singleton continues to support me in this role.

7. On October 13, 2017, Ms. Singleton and I met with members of the College Republicans, including Chevy Swanson, to discuss their plans for upcoming events. They said that they were considering hosting another talk with Milo Yiannopoulos in April 2018. They

also said that they were considering inviting Joey Gibson, the founder of Patriot Prayer, to attend a regular meeting of the College Republicans in early November 2017. Ms. Singleton stated that  
 1 Patriot Prayer is “high-profile” and that they would need to plan ahead before hosting Mr.  
 2 Gibson. To the best of my recollection, neither Ms. Singleton nor I described Patriot Prayer as a  
 3 “controversial” group.  
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5       8. On October 17, 2017, Ms. Singleton and I received an email from an individual  
 6 who identified himself/herself as “[d]irect representation of the Patriot prayer group.” Although  
 7 Ms. Singleton responded that Student Life works with RSOs and referred him/her to the  
 8 leadership of the College Republicans, he/she responded that the College Republicans were not  
 9 “providing us a time frame to adequately prepare, promote, and properly execute the  
 10 event....” Later in the day, the College Republicans’ president emailed Ms. Singleton that  
 11 he/she was “sorry” and that “[i]t was incredibly out of line for [the Patriot Prayer representative]  
 12 to attempt to go over our heads in order to bother you and attempt to expedite the process.” That  
 13 evening, the College Republicans emailed Ms. Singleton: “We have canceled the event. [The  
 14 Patriot Prayer representative] is too unprofessional for us to be risking working with  
 15 [him/her].” True and correct copies of redacted email chains, which are public records kept in  
 16 the ordinary course of business, are attached as Exhibits 1 through 3.  
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18       9. On January 11, 2018, I saw a banner advertisement on the College Republicans’  
 19 Facebook for a rally with the Patriot Prayer group in Red Square on Saturday, February 10,  
 20 2018. The College Republicans began advertising the event before reserving the space or  
 21 applying for approval from the UUF chair and the Office of Special Programs. Ms. Singleton,  
 22 UWPD officers, and I convened multiple meetings with the College Republicans to help them  
 23 plan a safe and successful event. During the planning process, Ms. Singleton and I advised and  
 24 supported them in meeting various requirements for hosting the event, including reserving Red  
 25 Square.  
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Square, applying for approval from UUF and the Office of Special Events, notifying facilities adjacent to Red Square about the event, and complying with sound amplification restrictions.

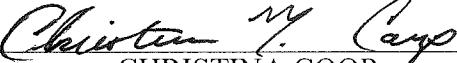
The College Republicans estimated that about 100 people would attend the rally.

10. Under the University's administrative code provisions and written policies, only a discrete group of people and organizations—faculty, staff, RSOs, and official student governments, as well as academic and administrative units of the University—may host events on campus. Campus events are subject to further restrictions based on the type of speech (e.g., political, private and commercial, distribution of handbills). Outside groups must always have University sponsorship, and all events to which the public is invited must also be sponsored by an academic or administrative unit. For an event in a campus location such as Red Square, the host must reserve the space, complete the UUF application process if the general public will be invited, and comply with sound amplification restrictions, among other things.

11. RSOs are required to have an academic or administrative unit sponsor if the general public will be invited to the events. The Student Activities Office frequently serves in this capacity for events hosted by RSOs. The Student Activities Office served as the sponsor for the College Republicans for the Yiannopoulos event and the Patriot Prayer event.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

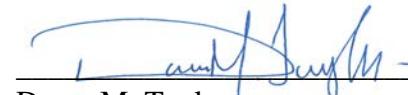
Dated this 26th day of March, 2018.

  
CHRISTINA COOP

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on this 27th day of March, 2018, I electronically filed the foregoing  
3 document with the Clerk of the United States District Court using the CM/ECF system which  
4 will send notification of such filing to all parties who are registered with the CM/ECF system.

5                   DATED this 27th day of March, 2018.

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7                   Dawn M. Taylor

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